

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)
)
Plaintiff,)
)
vs.) Case No.: 4:14-cr-153 ERW (TCM)
)
JAMES STALEY)
)
Defendant.)

DEFENDANT'S FOURTH MOTION TO TRAVEL

COMES NOW Defendant, James Staley, by and through counsel, and hereby moves this Court for permission to extend his vacation with his family to Table Rock Lake from August 25, 2015 until August 31, 2015. In support of this motion, Defendant states as follows:

1. Defendant pled guilty to four violations of Title 18 U.S.C. § 1343 on April 30, 2015 and was sentenced to an 84 month period of incarceration on August 19, 2015.
2. Defendant's Third Motion to Travel was approved by the Court and allowed Defendant to travel with his family to Table Rock Lake from August 15, 2015 until August 25, 2015.
3. Upon motion by counsel, this Court continued Defendant's sentencing hearing to August 19, 2015. As a result, Defendant did not begin his vacation until August 20th.
4. Because of this, Defendant requests that he be allowed to extend his vacation from August 25, 2015 until August 31, 2015.
5. Defendant has been on bond since June 24, 2014, and while he has accumulated four bond violations, the last was in February 2015.

6. Defendant has given no reason to this Court or any individual to presume that his travel will present either a meaningful risk of flight or danger to the community.

7. Defendant, through counsel, has discussed this matter with United States Pretrial Services Officer Shannon McCallister. Ms. McCallister does not object to Defendant's request.

8. Defendant, through counsel, has also discussed this matter with Assistant United States Attorney Dianna Collins. Ms. Collins does not object to Defendant's request.

WHEREFORE, Defendant respectfully requests this Honorable Court permit him to extend his vacation with his family in Table Rock Lake from August 25, 2015 until August 31, 2015.

Respectfully submitted,

ROSENBLUM, SCHWARTZ, ROGERS & GLASS, PC

By: /S/ Marc M. Johnson
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CERTIFICATE OF SERVICE

I hereby certify that on August 24, 2015, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Ms. Dianna Collins, assistant United States attorney.